

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ZENIMAX MEDIA INC. and ID SOFTWARE LLC

Plaintiffs,

v.

OCULUS VR, LLC, PALMER LUCKEY AND
FACEBOOK, INC.,

Defendants.

Case No.: 3:14-cv-01849-P

**APPENDIX OF DOCUMENTS SUBMITTED IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFFS’ MOTION TO COMPEL PRODUCTION OF
DOCUMENTS AND SOURCE CODE**

<u>Document</u>	<u>Exhibit</u>	<u>Page(s)</u>
Letter from Cassandra Reed to Phillip B. Philbin and P. Anthony Sammi enclosing Defendant Oculus VR, LLC’s second production of documents, dated March 27, 2015	1	1-2
Letter from P. Anthony Sammi to Geoffrey Howard enclosing Plaintiffs’ fifth production of documents, dated September 26, 2015	2	3-4
Letter from Elizabeth L. Stameshkin to P. Anthony Sammi enclosing Defendant Oculus VR, LLC’s third production of documents, Defendant Facebook, Inc.’s first production of documents, Defendant Palmer Luckey’s first production of documents, and Defendant Oculus VR, LLC’s first production of source code, dated April 29, 2015	3	5-6
Letter from Kristen Voorhees to Michael Rhodes enclosing Plaintiffs’ sixth production of documents, dated April 14, 2015	4	7-9
Letter from Michael G. Rhodes to P. Anthony Sammi requesting a meet and confer regarding Plaintiffs’ responses and objections to discovery, dated February 20, 2015	5	10-18
Letter from P. Anthony Sammi to Michael G. Rhodes regarding Plaintiffs’ document production, dated March 6, 2015	6	19-24

Email message from Matthew D. Caplan to Kurt Wm. Hemr, et al., regarding Defendants' document productions, dated April 10, 2015	7	25-28
Email message from Kurt Wm. Hemr to Matthew D. Caplan, et al., regarding Plaintiffs' motion to compel, dated April 10, 2015	8	29-33
Declaration of Elizabeth Stameshkin in Support of Defendants' Opposition to Plaintiffs' Motion to Compel Production of Documents and Source Code		34-36

Dated: April 29, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

On April 29, 2015, I hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). I hereby certify that I have served all counsel who are deemed to have consented to electronic service or by another manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Heidi L. Keefe
Heidi L. Keefe